

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Geneva Reed-Veal, Individually)
& as Mother and Personal)
Representative of the Estate of)
Sandra Bland, deceased.,)
)
Plaintiffs,)
)
v.) No. 4:15-cv-02232
) Judge David Hittner
Brian Encinia, Et al.,)
)
Defendants.)

PLAINTIFFS' ADDITIONAL AND SUPPLEMENTAL DISCLOSURE

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Plaintiffs Geneva Reed-Veal, Individually and as Mother and Personal Representative of the Estate of Sandra Bland, deceased, hereby submits their Initial Disclosure, as follows:

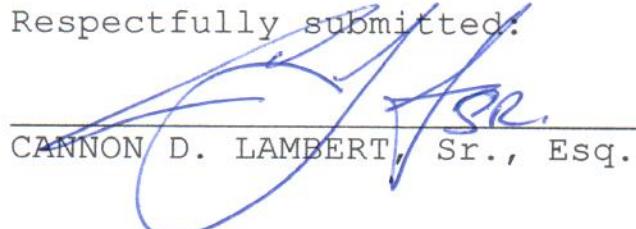
i) The name and, if known, the address and telephone number of each individual likely to have discoverable information-along with the subject of that information-that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

RESPONSE:

- 1) Jesus Lewis - filmed the bystander video.
- 2) Crag Davis - Past Jail Administrator who authored and issued a June 25, 2010 policy memo governing depressed inmates.
- 3) Officer, Michael Kelly - Prairie View police officer.

- This initial and preliminary disclosure will be amended upon Plaintiff obtaining additional information not yet in per possession. Plaintiff therefore, retain the right to supplement and/or amend this disclosure when and where doing so is appropriate.

Respectfully submitted:


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